

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRATTA TO
PUBLIC REPRESENTATIVE INTERROGATORY REDIRECTED FROM WITNESS
NERI TO WITNESS BRATTA (PR/USPS-T4-4(h))**
(February 14, 2012)

United States Postal Service witness Bratta (USPS-T-5) responds to the above-listed question from the Public Representative, redirected from witness Neri (USPS-T-4) and dated January 31, 2012. The question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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February 14, 2012

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRATTA
TO PUBLIC REPRESENTATIVE INTERROGATORY
REDIRECTED FROM WITNESS NERI

PR/USPS-T-4-4

In questions PR/USPS-T-4-1 (b) you were asked to provide “empirical evidence illustrating ‘excess capacity’ for the mail processing network”, the supporting calculations and data. In your response to PR/USPS-T-4-1 (b) you refer to USPS-LR-N2012-1/44.

- h. Would the decrease of idle time increase the costs for maintenance? Please provide the details if any analysis is available.

RESPONSE:

h. Preventative maintenance, corrective maintenance, and operational maintenance increase as machines run for longer time periods. Please see USPS Library Reference USPS-LR-N2012-1/59 for more information regarding this increase. Maintenance staffing is based on equipment inventory as well as the run time for that equipment.